

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET

IN RE: LTL Management LLC. APPLICANT: Otterbourg P.C.
CASE NO.: 21-30589 (MBK) CLIENT: Co-Counsel for Official Committee of Talc Claimants I
CHAPTER: 11 CASE FILED: October 14, 2021

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION UNDER
PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746

RETENTION ORDER ATTACHED

SECTION I
FEE SUMMARY

MONTHLY FEE STATEMENT COVERING THE PERIOD
JANUARY 1, 2022 THROUGH JANUARY 31, 2022

	<u>FEEES</u>	<u>EXPENSES</u>
TOTAL PREVIOUS FEES REQUESTED	<u>\$1,078,637.50</u>	<u>\$6,245.04</u>
TOTAL FEES ALLOWED TO DATE:	<u>\$0.00</u>	<u>\$0.00</u>
TOTAL RETAINER (IF APPLICABLE)	<u>N/A</u>	<u>N/A</u>
TOTAL HOLDBACK (IF APPLICABLE)	<u>\$215,727.50</u>	<u>\$0.00</u>
TOTAL RECEIVED BY APPLICANT	<u>\$862,910.00</u>	<u>\$6,245.04</u>

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,470.00	174.7	\$256,809.00
Adam C. Silverstein ("ACS") Partner	1985	\$1,045.00	75.7	\$79,106.50
Jennifer S. Feeney ("JSF") Partner	1998	\$940.00	91.9	\$86,386.00
John Bougiamas ("JB") Associate	1993	\$860.00	57.9	\$49,794.00
Robert C. Yan ("RCY") Associate	2002	\$700.00	11.4	\$7,980.00
Michael R. Maizel ("MRM") Associate	2017	\$475.00	36.2	\$17,195.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$345.00	23.3	\$8,038.50
TOTAL FEES			471.1	\$505,309.00
BLENDED RATE		\$1,072.62		

Pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals, currently requested fees are net of a 20% holdback. A request for the holdback amount will be included in the next interim fee application:

Fees	\$505,309.00
Less: Holdback (20%)	-\$101,061.80
Total Fees Currently Payable	<u>\$404,247.20</u>
Add: Disbursements	\$1,787.08
Total Payable This Invoice	<u><u>\$406,034.28</u></u>

SECTION II
SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
Plan of Reorganization	1.3	\$1,011.50
Investigation/Asset Analysis & Recovery	8.1	\$10,771.50
Committee Meetings	84.3	\$93,645.00
Communications with Creditors' Committee	48.4	\$61,273.50
Preparation of Application for Allowance	6.0	\$3,218.50
Claims Objection Work/Claims Admin	32.6	\$42,422.50
Fee / Employment Objections	3.4	\$3,302.50
Stay Proceedings	172.8	\$171,093.50
Litigation/Adversary Proceedings	49.3	\$53,361.00
Case Administration/General Services	64.9	\$65,209.50
TOTAL	471.1	\$505,309.00

SECTION III
SUMMARY OF DISBURSEMENTS

CATEGORY	AMOUNT
Conference Call(s)	\$650.00
Electronic Research	\$952.59
Transportation	\$184.49
TOTAL DISBURSEMENTS	\$1,787.08

**SECTION IV
CASE HISTORY**

- (1) Date Case filed: October 14, 2021
- (2) Chapter under which Case commenced: 11
- (3) Date of retention: December 16, 2021, effective as of November 12, 2021 (*see* **Exhibit A**)
If limit on number of hours or other limitations to retention, set forth: None
- (4) Summarize in brief the benefits to the estate and attach supplements as needed:¹
 - a) Applicant worked on matters in connection with the Debtor's request for preliminary injunctive relief and extension of the stay to hundreds of non-debtors, which work included taking lead in preparing strategy for Preliminary Injunction hearings and status conferences.
 - b) Applicant participated in in-person meetings and frequent videoconference meetings with the Committee Member Representatives, as well as with the Committee Members, including communications with Committee Member Representatives on case activities and updates;
 - c) Applicant was in frequent daily communications with co-counsel to strategize on motions, hearings, discovery and other matters in the case, and to coordinate the division of labor to avoid duplication;
 - d) Reviewed and provided comments to other pleadings and communications with the Court drafted by co-counsel to the Committee;
 - e) Attendance and participation at multiple hearings and status conferences; and
 - f) All other services listed on the copy of computer-generated time detail reflecting time recorded, organized in project billing categories attached hereto as **Exhibit B**.
- (5) Anticipated Distribution to Creditors:
 - (A) Administration expense: (unknown at this time)
 - (B) Secured creditors: (unknown at this time)
 - (C) Priority creditors: (unknown at this time)
 - (D) General unsecured creditors: (unknown at this time)

¹ The following summary is intended to highlight the general categories of services the Applicant rendered as co-counsel to the Committee; it is not intended to itemize each and every professional service which the Applicant performed.

- (6) Final disposition of case and percentage of dividend paid to creditors (if applicable): Final disposition of case and dividend are unknown at this time.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Melanie L. Cyganowski

Melanie L. Cyganowski, Esq.

Dated: February 18, 2022